

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b> _____
<b>v.</b>	:	<b>DATE FILED:</b> _____
<b>JOHN AGOT CANLAS</b>	:	<b>VIOLATIONS:</b>
<b>RASHEID MALIC ROBINSON</b>	:	<b>18 U.S.C. § 371 (conspiracy to commit</b>
<b>MARQUIS JAMAL WICKER</b>	:	<b>bank robbery - 1 count)</b>
	:	<b>18 U.S.C. § 2113(d) (armed bank robbery -</b>
	:	<b>2 counts)</b>
	:	<b>18 U.S.C. § 2113(a) (bank robbery - 6</b>
	:	<b>counts)</b>
	:	<b>18 U.S.C. § 924(c) (using and carrying a</b>
	:	<b>firearm during and in relation to a crime of</b>
	:	<b>violence - 2 counts)</b>
	:	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	:	<b>Notice of forfeiture</b>

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From on or about July 24, 2008, to on or about October 22, 2008, in the Eastern District of Pennsylvania, the Middle District of Pennsylvania, the District of New Jersey, and the District of Delaware, defendants

**JOHN AGOT CANLAS,  
RASHEID MALIC ROBINSON,  
MARQUIS JAMAL WICKER,**

and a person known to the grand jury as Person #1, conspired and agreed together to commit offenses against the United States, that is, to knowingly and unlawfully commit armed and unarmed bank robbery of the banks, listed in the chart below, the deposits of which were and are insured by the Federal Deposit Insurance Corporation:

<b>THE BANKS</b>
ABINGTON BANK, 800 North Bethlehem Pike, Spring House, PA 19477
THE BANK, 22 Village Center Drive, Sweedsboro, NJ 08085
BENEFICIAL BANK, 3220 Route 38, Mount Laurel, NJ 08054
CITIZENS BANK, 4565 New Falls Road, Levittown, PA 19056
CITIZENS BANK, 301 S. RT 73, Marlton, NJ 08053
COLUMBIA SAVINGS BANK, 99 Ramblewood Parkway, Mount Laurel, NJ 08054
COMMERCE BANK, 3933 Hulmeville Road, Bensalem, PA 19020
COMMERCE BANK, 1999 Lenola Road, Cinnaminson, NJ 08077
COMMERCE BANK, 90 Upper Silver Lake Road, Newtown, PA 18940
COMMERCE BANK, 3951 Union Deposit Road Harrisburg, PA 17109
FULTON BANK, 2100 Street Road, Bensalem, PA 19020
PNC BANK, 954 Youngford Road, Gladwyne, PA 19035
PNC BANK, 25 Pencader Plaza, Newark, DE 19713
TD BANKNORTH, 150 South White Horse Pike, Berlin, NJ 08009
WACHOVIA BANK, 1375 Skippack Pike, Blue Bell, PA 19422
WACHOVIA BANK, 804 Route 130 North, Brooklawn, NJ 08030

All in violation of Title 18, United States Code, Sections 2113 (a) and (d).

### **MANNER AND MEANS**

2. It was part of the conspiracy that defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER and Person #1 agreed to commit and committed both armed and unarmed robberies of the banks set forth in paragraph 1, and stole approximately \$71,710.

### **OVERT ACTS**

In furtherance of the conspiracy, defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER and Person #1 committed the following overt acts, among others, in the Eastern District of Pennsylvania, the Middle District of Pennsylvania, the District of New Jersey, and the District of Delaware:

#### **Bank Robbery of Abington Bank, Spring House, PA**

On or about July 24, 2008:

1. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON discussed their plan to rob the Abington Bank, located at 800 N. Bethlehem Pike in Spring House, PA.
2. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON drove together to the Abington Bank to commit a bank robbery.
3. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON entered the Abington Bank wearing hats, sunglasses, and latex gloves to conceal their identities.
4. Once inside the bank, defendant RASHEID MALIC ROBINSON presented a demand note to the teller, as defendant JOHN AGOT CANLAS stood by his side and directed a second teller not to move.
5. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON stole approximately \$5,580, and fled from the bank into the awaiting getaway car.
6. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON subsequently divided the proceeds from the robbery.

**Armed Bank Robbery of PNC Bank, Gladwyne, PA**

On or about August 19, 2008:

7. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER discussed their plan to rob the PNC Bank, located at 954 Youngford Road in Gladwyne, PA.

8. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER drove together to the PNC Bank to commit an armed bank robbery.

9. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER entered the bank dressed as construction workers, wearing hard hats, reflective vests, dust masks, jeans, boots, and latex gloves to conceal their identities.

10. Defendant MARQUIS JAMAL WICKER brandished a .22 caliber rifle.

11. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER demanded money from the bank's tellers at gunpoint, stole approximately \$3,666, and fled from the bank into the awaiting getaway car.

12. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER subsequently divided the proceeds from the robbery.

**Robbery of Commerce Bank, Cinnaminson, N.J.**

On or about August 24, 2008:

13. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON discussed their plan to rob the Commerce Bank, located at 1999 Lenola Road in Cinnaminson, N.J.

14. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON drove together to the Commerce Bank to commit the bank robbery.

15. Defendant RASHEID MALIC ROBINSON entered the Commerce Bank wearing a hat, sunglasses, and latex gloves to conceal his identity, while defendant JOHN AGOT CANLAS waited outside in the getaway car.

16. Once inside the bank, defendant RASHEID MALIC ROBINSON presented a demand note to the teller.

17. Defendant RASHEID MALIC ROBINSON stole approximately \$4,250, and fled from the bank into the awaiting getaway car driven by defendant JOHN AGOT CANLAS.

18. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON subsequently divided the proceeds from the robbery.

**Robbery of Wachovia Bank, Brooklawn, N.J.**

On or about August 29, 2008:

19. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON discussed their plan to rob the Wachovia Bank, located at 804 Route 130 North in Brooklawn, N.J.

20. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON drove together to the Wachovia Bank to commit the bank robbery.

21. Defendant RASHEID MALIC ROBINSON entered the Wachovia Bank wearing a hat, sunglasses, and latex gloves to conceal his identity, while defendant JOHN AGOT CANLAS waited outside in the getaway car.

22. Once inside the bank, defendant RASHEID MALIC ROBINSON presented a demand note to the teller.

23. Defendant RASHEID MALIC ROBINSON stole approximately \$4,491, and fled from the bank into the awaiting getaway car driven by defendant JOHN AGOT CANLAS.

24. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON subsequently divided the proceeds from the robbery.

**Robbery of Commerce Bank, Bensalem, PA**

On or about August 30, 2008:

25. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON discussed their plan to rob the Commerce Bank, located at 3933 Hulmeville Road in Bensalem, PA.

26. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON drove together to the Commerce Bank to commit the bank robbery.

27. Defendant JOHN AGOT CANLAS entered the Commerce Bank wearing a hat, sunglasses, and latex gloves to conceal his identity, while defendant RASHEID MALIC ROBINSON waited outside in the getaway car.

28. Once inside the bank, defendant JOHN AGOT CANLAS presented a demand note to the teller.

29. Defendant JOHN AGOT CANLAS stole approximately \$8,210, and fled from the bank into the awaiting getaway car driven by defendant RASHEID MALIC ROBINSON.

30. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON subsequently divided the proceeds from the robbery.

**Robbery of The Bank, Sweedsboro, N.J.**

On or about September 3, 2008:

31. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON discussed their plan to rob The Bank, located at 22 Village Center Drive in Sweedsboro, N.J. .

32. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON drove together to The Bank to commit the bank robbery.

33. Defendant RASHEID MALIC ROBINSON entered The Bank wearing a hat, sunglasses, and latex gloves to conceal his identity, while defendant JOHN AGOT CANLAS waited outside in the getaway car.

34. Once inside the bank, defendant RASHEID MALIC ROBINSON presented a demand note to the teller.

35. Defendant RASHEID MALIC ROBINSON stole approximately \$2,121, and fled from the bank into the awaiting getaway car driven by defendant JOHN AGOT CANLAS.

36. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON subsequently divided the proceeds from the robbery.

**Robbery of TD Banknorth Bank, Berlin, N.J.**

On or about September 3, 2008:

37. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON discussed their plan to rob TD Banknorth Bank, located at 150 South White Horse Pike in Berlin, N.J.

38. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON drove together to TD Banknorth Bank to commit the bank robbery.

39. Defendant JOHN AGOT CANLAS entered TD Banknorth Bank wearing a hat, sunglasses, and latex gloves to conceal his identity, while defendant RASHEID MALIC ROBINSON waited outside in the getaway car.

40. Once inside the bank, defendant JOHN AGOT CANLAS presented a demand note to the teller.

41. Defendant JOHN AGOT CANLAS stole approximately \$2,019, and fled from the bank into the awaiting getaway car driven by defendant RASHEID MALIC ROBINSON .

42. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON subsequently divided the proceeds from the robbery.

**Robbery of Fulton Bank, Bensalem, PA**

On or about September 4, 2008:

43. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON discussed their plan to rob the Fulton Bank, located at 2100 Street Road in Bensalem, PA.



44. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON drove together to the Fulton Bank to commit the bank robbery.

45. Defendant RASHEID MALIC ROBINSON entered the Fulton Bank wearing a hat, sunglasses, and latex gloves to conceal his identity, while defendant JOHN AGOT CANLAS waited outside in the getaway car.

46. Once inside the bank, defendant RASHEID MALIC ROBINSON presented a demand note to the teller.

47. Defendant RASHEID MALIC ROBINSON stole approximately \$628, and fled from the bank into the awaiting getaway car driven by defendant JOHN AGOT CANLAS.

48. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON subsequently divided the proceeds from the robbery.

**Robbery of Columbia Savings Bank, Marlton, N.J.**

On or about September 4, 2008:

49. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON discussed their plan to rob the Columbia Savings Bank, located at 99 Ramblewood Parkway in Mount Laurel, N.J.

50. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON drove together to the Columbia Savings Bank to commit the bank robbery.

51. Defendant JOHN AGOT CANLAS entered the Columbia Savings Bank wearing a hat, sunglasses, and latex gloves to conceal his identity, while defendant RASHEID MALIC ROBINSON waited outside in the getaway car.

52. Once inside the bank, defendant JOHN AGOT CANLAS presented a demand note to the teller.

53. Defendant JOHN AGOT CANLAS stole approximately \$200, and fled from the bank into the awaiting getaway car driven by defendant RASHEID MALIC ROBINSON .

54. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON subsequently divided the proceeds from the robbery.

**Robbery of Citizens Bank, Marlton, N.J.**

On or about September 11, 2008:

55. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON discussed their plan to rob the Citizens Bank, located at 301 S. RT 73 in Marlton, N.J.

56. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON drove together to the Citizens Bank to commit the bank robbery.

57. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON entered the Citizens Bank wearing hats, sunglasses, and latex gloves to conceal their identities.

58. Once inside the bank, defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON presented a demand note to the teller.

59. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON stole approximately \$3,182, and fled from the bank into the awaiting getaway car.

60. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON subsequently divided the proceeds from the robbery.

**Robbery of Wachovia Bank, Blue Bell, PA**

On or about September 11, 2008:

61. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON discussed their plan to rob the Wachovia Bank, located at 1375 Skippack Pike in BlueBell, PA.

62. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON drove together to the Wachovia Bank to commit the bank robbery.

63. Once inside the bank, defendant RASHEID MALIC ROBINSON presented a demand note to the teller and made a verbal demand for money.

64. Defendant RASHEID MALIC ROBINSON stole approximately \$1,160, and fled from the bank into the awaiting getaway car driven by defendant JOHN AGOT CANLAS.

65. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON subsequently divided the proceeds from the robbery.

**Robbery of Citizens Bank, Levittown, PA**

On or about September 19, 2008:

66. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON discussed their plan to rob the Citizens Bank, located at 4565 New Falls Road Levittown, PA.

67. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON drove together to the Citizens Bank to commit the bank robbery.

68. Defendants RASHEID MALIC ROBINSON entered the Citizens Bank wearing a hat, sunglasses, and latex gloves to conceal his identity, while defendant JOHN AGOT CANLAS waited outside in the getaway car.

69. Once inside the bank, defendant RASHEID MALIC ROBINSON made a verbal demand for money to the teller.

70. Defendant RASHEID MALIC ROBINSON stole approximately \$1,263, and fled from the bank into the awaiting getaway car driven by defendant JOHN AGOT CANLAS.

71. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON subsequently divided the proceeds from the robbery.

**Robbery of Commerce Bank, Newtown, PA**

On or about September 20, 2008:

72. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON discussed their plan to rob the Commerce Bank, located at 90 Upper Silver Lake Road, in Newtown, PA.

73. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON drove together to the Commerce Bank to commit the bank robbery.

74. Defendants RASHEID MALIC ROBINSON entered the Commerce Bank wearing a hat, sunglasses, and latex gloves to conceal his identity, while defendant JOHN AGOT CANLAS waited outside in the getaway car.

75. Once inside the bank, defendant RASHEID MALIC ROBINSON presented a demand note to the teller.

76. Defendant RASHEID MALIC ROBINSON stole approximately \$2,491, and fled from the bank into the awaiting getaway car driven by defendant JOHN AGOT CANLAS.

77. Defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON subsequently divided the proceeds from the robbery.

**Robbery of PNC Bank, Newark, DE**

On or about October 6, 2008:

78. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER discussed their plan to rob the PNC Bank located at 25 Pencader Plaza, in Newark, DE .

79. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER drove together to the PNC Bank to commit the bank robbery.

80. Defendants RASHEID MALIC ROBINSON and MARQUIS JAMAL WICKER entered the PNC Bank wearing hooded sweatshirts, a cloth covering their faces, and latex gloves to conceal their identities.

81. Once inside the bank, defendant RASHEID MALIC ROBINSON made a verbal demand for money to the teller as defendant MARQUIS JAMAL WICKER stood by his side.

82. Defendants RASHEID MALIC ROBINSON and MARQUIS JAMAL WICKER stole approximately \$6,358, and fled from the bank into the awaiting getaway car driven by defendant JOHN AGOT CANLAS.

83. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER subsequently divided the proceeds from the robbery.

**Armed Robbery of Beneficial Bank, Mount Laurel, N.J.**

On or about October 16, 2008:

84. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER discussed their plan to rob the Beneficial Bank located at 3220 Route 38 in Mount Laurel, N.J.

85. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER drove together to the Beneficial Bank to commit the armed bank robbery.

86. Defendants RASHEID MALIC ROBINSON and MARQUIS JAMAL WICKER entered the Beneficial Bank wearing dark ski masks and hooded sweatshirts, while defendant JOHN AGOT CANLAS waited outside in a getaway car.

87. Once inside the bank, defendant MARQUIS JAMAL WICKER brandished a .22 caliber rifle and ordered employees to lay on the floor.

88. Defendants RASHEID MALIC ROBINSON and MARQUIS JAMAL WICKER demanded money from the bank's tellers at gunpoint, stole approximately \$10,983, and fled from the bank into the awaiting getaway car driven by defendant JOHN AGOT CANLAS.

89. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER subsequently divided the proceeds from the robbery.

**Robbery of Commerce Bank, Harrisburg, PA**

On or about October 18, 2008:

90. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER, and Person #1 discussed their plan to rob the Commerce Bank, located at 3951 Union Deposit Road in Harrisburg, PA.

91. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER, and Person #1 drove together to the Commerce Bank to commit the bank robbery.

92. Defendant MARQUIS JAMAL WICKER entered the Commerce Bank wearing a dark hooded sweatshirt, while defendants JOHN AGOT CANLAS and RASHEID MALIC ROBINSON waited outside in a getaway car.

93. Once inside the bank, defendant MARQUIS JAMAL WICKER handed a bank teller a note demanding money.

94. Defendants MARQUIS JAMAL WICKER stole approximately \$9,300, and fled from the bank into the awaiting getaway car.

95. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER and Person #1 subsequently divided the proceeds from the robbery.

**Armed Robbery of Abington Bank, Spring House, PA**

On or about October 22, 2008:

96. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER discussed their plan to rob the Abington Bank, located at 800 N. Bethlehem Pike in Spring House, PA.

97. Defendants JOHN AGOT CANLAS, RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER drove together to the Abington Bank to commit the armed bank robbery.

98. Defendants RASHEID MALIC ROBINSON and MARQUIS JAMAL WICKER entered the Abington Bank wearing masks, while defendant JOHN AGOT CANLAS waited outside in a getaway car.

99. Once inside the bank, defendant MARQUIS JAMAL WICKER brandished a .22 caliber rifle and ordered employees to lay on the floor.

100. Defendants RASHEID MALIC ROBINSON, and MARQUIS JAMAL WICKER demanded money from the bank tellers at gunpoint, stole approximately \$14,018, and fled from the bank into the awaiting getaway car driven by defendant JOHN AGOT CANLAS.

All in violation of Title 18, United States Code, Section 371.



**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 24, 2008, in Spring House, in the Eastern District of Pennsylvania, defendants

**JOHN AGOT CANLAS and  
RASHEID MALIC ROBINSON**

knowingly and unlawfully by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Abington Bank, lawful currency of the United States, that is, approximately \$5,580, belonging to, and in the care, custody, control, management and possession of the Abington Bank, 800 North Bethlehem Pike, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 19, 2008, in Gladwyne, in the Eastern District of Pennsylvania, defendants

**JOHN AGOT CANLAS,  
RASHEID MALIC ROBINSON, and  
MARQUIS JAMAL WICKER**

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of PNC Bank, lawful currency of the United States, belonging to, and in the care, custody, control, management and possession of the PNC Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants CANLAS, ROBINSON, and WICKER knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the PNC Bank, and other persons, by use of a dangerous weapon, that is, a Stevens .22 caliber rifle, model 87A, serial number 2223093RF225852271576.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 19, 2008, in Gladwyne, in the Eastern District of Pennsylvania, defendants

**JOHN AGOT CANLAS,  
RASHEID MALIC ROBINSON, and  
MARQUIS JAMAL WICKER**

knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, a Stevens .22 caliber rifle, model 87A, serial number 2223093RF225852271576, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit armed bank robbery, in violation of Title 18, United States Code, Section 371, and armed bank robbery, in violation of Title 18, United States Code, Sections 2113(d) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 30, 2008, in Bensalem, in the Eastern District of Pennsylvania, defendants

**JOHN AGOT CANLAS and  
RASHEID MALIC ROBINSON**

knowingly and unlawfully by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Commerce Bank, lawful currency of the United States, that is, approximately \$8,210, belonging to, and in the care, custody, control, management and possession of the Commerce Bank, 3933 Hulmeville Road, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 4, 2008, in Bensalem, in the Eastern District of Pennsylvania, defendants

**JOHN AGOT CANLAS and  
RASHEID MALIC ROBINSON**

knowingly and unlawfully by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Fulton Bank, lawful currency of the United States, that is, approximately \$628, belonging to, and in the care, custody, control, management and possession of the Fulton Bank, 2100 Street Road, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 11, 2008, in Blue Bell, in the Eastern District of Pennsylvania, defendants

**JOHN AGOT CANLAS and  
RASHEID MALIC ROBINSON**

knowingly and unlawfully by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Wachovia Bank, lawful currency of the United States, that is, approximately \$3,160, belonging to, and in the care, custody, control, management and possession of the Wachovia Bank, 1375 Skippack Pike, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 19, 2008, in Levittown, in the Eastern District of Pennsylvania, defendants

**JOHN AGOT CANLAS and  
RASHEID MALIC ROBINSON**

knowingly and unlawfully by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Citizens Bank, lawful currency of the United States, that is, approximately \$1,263, belonging to, and in the care, custody, control, management and possession of the Citizens Bank, 4565 New Falls Road, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 20, 2008, in Newtown, in the Eastern District of Pennsylvania, defendants

**JOHN AGOT CANLAS and  
RASHEID MALIC ROBINSON**

knowingly and unlawfully by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Commerce Bank, lawful currency of the United States, that is, approximately \$2,491, belonging to, and in the care, custody, control, management and possession of the Commerce Bank, 90 Upper Silver Lake Road, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.



**COUNT TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 22, 2008, in Spring House, in the Eastern District of Pennsylvania, defendants

**JOHN AGOT CANLAS,  
RASHEID MALIC ROBINSON, and  
MARQUIS JAMAL WICKER**

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Abington Bank, lawful currency of the United States, belonging to, and in the care, custody, control, management and possession of the Abington Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants CANLAS, ROBINSON, and WICKER knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Abington Bank, and other persons, by use of a dangerous weapon, that is, a Stevens .22 caliber rifle, model 87A, serial number 2223093RF225852271576.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

**COUNT ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 22, 2008, in Spring House, in the Eastern District of Pennsylvania, defendants

**JOHN AGOT CANLAS,  
RASHEID MALIC ROBINSON, and  
MARQUIS JAMAL WICKER**

knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, a Stevens .22 caliber rifle, model 87A, serial number 2223093RF225852271576, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit armed bank robbery, in violation of Title 18, United States Code, Section 371, and armed bank robbery, in violation of Title 18, United States Code, Sections 2113(d) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Section 924(c), set forth in this superseding indictment, defendants

**JOHN AGOT CANLAS,  
RASHEID MALIC ROBINSON, and  
MARQUIS JAMAL WICKER**

shall forfeit to the United States of America, the firearm involved in the commission of this offense, including, but not limited to:

-a Stevens .22 caliber rifle, model 87A, serial number 2223093RF225852271576.

All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**LAURIE MAGID**  
**United States Attorney**